



GRETCHEN WHITMER  
GOVERNOR

STATE OF MICHIGAN  
DEPARTMENT OF  
ENVIRONMENT, GREAT LAKES, AND ENERGY  
LANSING



PHILLIP D. ROOS  
DIRECTOR

July 23, 2024

VIA E-MAIL

Ron Crawford  
City of Detroit Construction and  
Demolition Department  
Public Safety Headquarters  
1301 3<sup>rd</sup> Avenue, 6<sup>th</sup> Floor  
Detroit, Michigan 48226

Keith Jones  
J. Keith Construction, LLC  
1010 Antietam Avenue  
Detroit, Michigan 48207

SRN/ID: U822402215; Wayne County

Dear Ron Crawford and Keith Jones:

**VIOLATION NOTICE**

On May 31, 2024, the Department of Environment, Great Lakes, and Energy (EGLE), Air Quality Division (AQD) conducted an inspection of the residential property located at 8163 Mandalay Street, Detroit, Wayne County. The purpose of this inspection was to determine compliance with the requirements of Title 40 of the Code of Federal Regulations (40 CFR), Part 61, National Emission Standards for Hazardous Air Pollutants (NESHAP), Subpart M and Rule 942 of the administrative rules promulgated under Part 55, Air Pollution Control of the Natural Resources and Environmental Protection Act, 1994 PA 451, as amended.

According to our investigation, the City of Detroit Construction and Demolition Department oversees the City of Detroit's demolition program. J. Keith Construction, LLC performed demolition activities at the site. The NESHAP for Asbestos holds the operators equally liable for violations.

During the inspection, EGLE, AQD noted the residential building had been wrecked. Samples collected by EGLE, AQD identified positive plaster at the site. The following violations were noted:

Process Description	Section Violated	Comments
Demolition of a residential property located at 8163 Mandalay St. Detroit.	40 CFR 61.145(b)(2); Consent Judgment No. 18-862, Section 5.1	Failure to update notification-the demolition end date was noted as May 1, 2024.
	40 CFR 61.150(a)(1)(i). Consent Judgment No. 18-862, Section 5.1	Failure to keep asbestos-containing waste material adequately wet until disposal at a Type II landfill-the ACWM was not adequately wet.
	40 CFR 61.150(b)(1); Consent Judgment No. 18-862, Section 5.1	Failure to deposit asbestos containing waste material as soon as practical at a Type II facility licensed to accept ACWM- the demolition start date was noted as April 25, 2024.

## **VIOLATION NOTICE**

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Please initiate actions necessary to correct the cited violations and submit a signed written response to this Violation Notice by August 16, 2024. The response should include: the dates the violations occurred; an explanation of the causes and duration of the violations; whether the violations are ongoing; a summary of the actions that have been taken and are proposed to be taken to correct the violations and the dates by which these actions will take place; and what steps are being taken to prevent a reoccurrence.

The signed written response from the operators to this violation notice may be submitted by mail and directed to the attention of Jeremy Howe, Supervisor, Technical Programs Unit at EGLE, AQD, P.O. Box 30260, Lansing, Michigan 48909-7760 and must include a copy to Jason Wolf, Enforcement Unit at the same address. The response may be scanned and e-mailed to [HoweJ1@Michigan.gov](mailto:HoweJ1@Michigan.gov) and [WolfJ2@Michigan.gov](mailto:WolfJ2@Michigan.gov).

If J. Keith Construction, LLC and/or the City of Detroit Construction and Demolition Department believes the above observations or statements are inaccurate or do not constitute violations of the applicable legal requirements cited, please provide factual information to explain your position.

Thank you for your attention to resolving the violations cited above and for the cooperation that was extended to me during my inspection of 8163 Mandalay Street, Detroit, Wayne County. If you have any questions regarding the violation or the actions necessary to bring this facility into compliance, please contact me at the number listed below.

Sincerely,



Tammy Bell  
Environmental Quality Specialist  
Air Quality Division  
313-330-0105

Enclosure: Sample Results

cc: Crystal Rogers, Detroit BSEED  
Mark Baron, Detroit BSEED  
Annette Switzer, EGLE  
Christopher Ethridge, EGLE  
Brad Myott, EGLE  
Jeremy Howe, EGLE  
Dr. April Wendling, EGLE  
Jason Wolf, EGLE